TECHNICAL REVIEW DOCUMENT for OPERATING PERMIT 990PEP218

to be issued to:

Waste Management of Colorado, Inc.
Midway Landfill
El Paso County
Source ID 0410325

Prepared by Cathy Rhodes June, 2000

I. PURPOSE:

This document establishes the basis for decisions made regarding the Applicable Requirements, Emission Factors, Monitoring Plan and Compliance Status of Emission Units covered within the Operating Permit proposed for this site. It is designed for reference during review of the proposed permit by the EPA and during Public Comment. This narrative is intended only as an adjunct for the reviewer and has no legal standing. Conclusions in this document are based on information provided in the original application submittal of December 22, 1999, and supplemental Title V technical information.

Any revisions made to the underlying construction permits associated with this facility in conjunction with the processing of this operating permit application have been reviewed in accordance with the requirements of Regulation No. 3, part B, Construction Permits, and have been found to meet all applicable substantive and procedural requirements. This operating permit incorporates and shall be considered to be a combined construction/operating permit for any such revision, and the permittee shall be allowed to operate under the revised conditions upon issuance of this operating permit without applying for a revision to this permit or for an additional or revised Construction Permit.

II. Source Description:

This facility disposes of municipal solid waste. The facility is located on El Centro Boulevard in Fountain. There are no affected states within 50 miles of the facility. There are no Federal Class I designated areas within 100 kilometers of the plant.

The Title V application reports the facility is not subject to the Accidental Release Plan provisions of 112(r)(7) of the Clean Air Act.

Facility wide emissions are as follows (tons/year):

| Pollutant | <u>Actual</u> | <u>Potential</u> |
|----------------------------------|---------------|------------------|
| Particulate Matter | 91 | 216 |
| PM_{10} | 26 | 63 |
| Volatile Organic Compounds (VOC) | 2 | 37 |
| Carbon Monoxide | <1 | 7 |

Actual emissions are based on estimated 2000 data. Potential emissions are based on data supplied with the operating permit application.

This facility has the potential to emit major amounts of Hazardous Air Pollutants (HAPs), according to the permit application. The EPA's current estimated date for proposing a MACT standard for landfills is August, 2000, with a promulgation date of September, 2001.

Prevention of Significant Deterioration and Nonattainment New Source Review

This plant is located in an area designated as attainment for all pollutants. The facility is a minor source for Prevention of Significant Deterioration purposes.

III. EMISSION SOURCES:

SUMMARY DESCRIPTION OF PROCESS

The following sources are specifically regulated under terms and conditions of the Operating Permit.

LFG - Landfill Gas Emissions - Process Unit E001

Landfill gas emissions are generated through degradation of biodegradable waste in the landfill.

FD - Particulate Emissions - Process Unit E002

Fugitive particulate emissions result from solid waste disposal activities, including unpaved haul roads, refuse handling, compost operations, and wind erosion from disturbed areas and storage piles.

When Waste Management acquired the Midway landfill in 1996, a construction permit modification request was submitted with the ownership transfer request. A draft permit was issued by the Division, however, the permit was never issued. The permit modification requests are included as part of the operating permit application, and incorporated into this operating permit under the combined construction/operating permit provisions of Colorado Regulation No. 3, Section III.B.7.

Applicable Requirements- Applicable requirements are as follows.

- Emission Guidelines for Existing Municipal Solid Waste Landfills (40 CFR Part 60, Subpart Cc, as adopted by reference in Colorado Regulation No. 6, Part A) (Note: Gas collection and control are not currently required at this site, because NMOC emissions calculated using the Tier 1 calculation have not equaled or exceeded 50 megagrams/year. Reporting and recordkeeping requirements apply.)
- C Colorado Regulation No. 1
 - C Opacity, no off-property transport, and nuisance emission guidelines (Section II.D)
 - C Particulate emission control measures (Section II.D.1.a) as listed in November 21, 1996 exemption letter from the Division to Waste Management)
- C Colorado Regulation No. 2 (Odor)
- C Final Approval Construction Permit 90EP148F
 - C Lists fugitive particulate emission control measures
 - C Requires annual records of actual quantity of refused disposed of in the landfill
 - C Limits type of refuse that may be accepted
 - C Lists estimate of fugitive particulate emissions

The applicant requested the following revisions to the Construction Permit:

From: The facility shall receive only dry household and commercial refuse including construction and demolition materials. There shall be no liquid waste, radioactive waste or drum containerized waste accepted. Also, no hazardous waste, whether or not detoxified or treated, including Resource Conservation and Recovery Act (RCRA) defined small quantity generator waste, will be accepted at the facility.

To: The facility shall receive only municipal solid waste that does not contain hazardous waste as defined in Section 25-101(9) of the Colorado Hazardous Waste Act, and 40 CFR 261.

The Division has determined that the new language encompasses the intent of the original language.

Fugitive particulate emission control plan:

From: Unpaved haul roads shall be graveled and shall be watered once a day and more often if necessary to control fugitive particulate emissions.

To: Dust suppressants shall be used as needed to control fugitive emissions from unpaved haul roads.

From: Six (6) inches of soil cover shall be applied following the placement of each refuse lift and at the end of each day.

To: Six (6) inches of soil cover or alternative daily cover shall be applied following the placement of each refuse lift at the end of each day.

The Division has determined that these alternative fugitive emission control measures are acceptable.

- Incorporated directly into the operating permit, based on information supplied in application for Construction Permit and Operating Permit:
 - C Emission limits for VOCs and CO
 - C Annual waste acceptance rate

Emission Factors- Fugitive PM emissions are estimated using AP-42 factors and equations, along with appropriate control measure efficiencies. Waste receipt information is used to determine landfill gas emissions, including CO, VOC, NMOC, and hazardous air pollutant emissions. The waste volume data is entered into the EPA standfill Gas Estimation Model.

Monitoring Plan- The permittee will perform a weekly visual inspection to ensure the fugitive particulate matter minimization methods are in place and effective. The Emission Guidelines set forth specific monitoring methods.

Compliance Status- The Division believes these sources were in compliance with applicable requirements as of the date of application submittal.

IV. Emission Factors

From time to time published emission factors are changed based on new or improved data. A logical concern is what happens if the use of the new emission factor in a calculation results in a source being out of compliance with a permit limit. For this operating permit, the emission factors or emission factor equations included in the permit are considered to be fixed until changed by the permit. Factors dependent on the fuel sulfur content or heat content can not be fixed and will vary with the test results. The formula for determining the emission factors is, however, fixed. It is the responsibility of the permittee to be aware of changes in the factors, and to notify the Division in writing of impacts on the permit requirements when there is a change in factors. Upon notification, the Division will work with the permittee to address the situation.